

## **REMARKS**

### **I. Introduction**

Claims 1, 3-9, 12-16, 18-24, and 27-30 were pending in the application when the Non-Final Office Action was mailed July 9, 2008. Claims 1, 3-9, 16, and 18-24 were rejected. Applicants have amended claims 16, 21, and 23, and added new claims 31-35. Accordingly, claims 1, 3-9, 12-16, 18-24, and 27-35 are currently pending, with claims 12-15 and 27-30 being withdrawn. No new matter is added.

The Office Action rejected claims 1, 3-9, 16, and 18-24. More specifically, the status of the claims in light of the Office Action is as follows:

(A) Claims 16 and 18-24 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter; and

(B) Claims 1, 3-9, 16, and 18-24 were rejected under 35 U.S.C. § 103(a) over the combination of Iverson, Lee, "NODAL: A Filesystem for Ubiquitous Collaboration" ("NODAL") and Armstrong, Eric, "[unrev-II] Meeting Summary: 4 May 2000" (referred to as "Iverson" in the Office Action and herein).

Applicants respectfully traverse these rejections.

The undersigned attorney, and his colleague, Rajiv P. Sarathy, Registration No. 55,592, thank the Examiner for engaging in a telephone conference on October 29, 2008 to discuss the present Office Action and distinctions between the pending claims and the applied references. Further details are provided below. If the Examiner needs any further information, he is encouraged to contact the undersigned.

### **II. The Applied References**

NODAL describes a "general, document-oriented distributed database and filesystem with a data model that allows addressing, searching and linking of content of

any kind from any document. ... Moreover, it is built on a distributed client-server (or peer-to-peer) communication model that seamlessly shifts from synchronous, real-time interaction to asynchronous or intermittently-connected interaction." (NODAL, Abstract.)

Iverson summarizes a meeting in which Lee Iverson described a distributed document object model.

### III. Applicant's Technology

Applicants' technology is generally directed to enabling collaborative authoring of hierarchical documents in a distributed computing system. In some cases, a registration request is received from a business logic event handler for an event of a distributed document object model system. The distributed document object model system causes the event to occur when a first modification is made to a hierarchical document. The business logic event handler is registered, and if the event occurs, is notified. An indication is received from the business logic event handler, and a business rule is applied that causes a second modification to the hierarchical document.

### IV. Response to the Office Action Rejections

Applicants respond to the Office Action rejections as follows:

#### A. Response to the § 101 Rejections of Claims 16 and 18-24

Claims 16 and 18-24 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Although applicants respectfully disagree with these rejections, applicants have nevertheless amended claim 16 to recite "a computing device having a memory" to expedite prosecution. As discussed during the October 29th telephone conference, support for this amendment may be found, for example, in paragraph [0146] of the specification as filed. Accordingly, applicants respectfully request that these rejections be withdrawn.

B. Response to the § 103(a) Rejections of Claims 1, 3-9, 16, and 18-24

Claims 1, 3-9, 16, and 18-24 were rejected under 35 U.S.C. § 103(a) over the combination of NODAL and Iverson. Applicants respectfully disagree with these rejections. Applicants' specification states that a business logic event handler may have an asynchronous invocation mode. (See, e.g., paragraph [0040].) The Office Action appears to suggest that simply because NODAL describes asynchronous notification, NODAL describes a business logic event handler. (See Office Action, pp. 3, 6, and 7.) The Office Action misinterprets a feature of the business logic event handler as its definition. Simply because a business logic event handler has an asynchronous mode does not mean that it is equivalent to any other object that also has an asynchronous mode.

Independent claims 1 and 16 each recite a business logic event handler and applying a business rule as a result of a notification to the business logic event handler. For example, claim 1 recites "receiving a registration request from a business logic event handler for an event of the distributed document object model" and "if the event occurs, notifying the business logic event handler and ... performing a function relating to the received indication, wherein the performed function applies a business rule." Neither NODAL nor Iverson teaches or suggests these features. The Office Action states that the cursor in NODAL corresponds to the business logic event handler as recited in the claims, pointing to NODAL at pages 20, 21, 26, and 27. (Office Action, p. 4.) The Office Action is incorrect. The cursor in NODAL is an intermediate object that enables a program to access nodes in a repository. (NODAL, p. 20.) The cursor enables the evaluation of permissions and the maintenance of an audit trail. (*Id.*) In contrast, claim 1 recites registering a business logic event handler for an event, monitoring for an occurrence of the event ("if the event occurs"), and upon the occurrence of the event, applying a business rule. NODAL's cursor is not registered for events and does not monitor for occurrence of events, let alone apply a business rule in response to occurrence of events. Therefore, NODAL's cursor does not correspond to

the business logic event handler as recited in claims 1 and 16. Iverson fails to cure NODAL's deficiencies. Accordingly, each of the pending independent claims is patentable over NODAL and Iverson, either alone or in combination. For at least these reasons, applicant respectfully request that these rejections be withdrawn.

C. New Claims 31-35

New claims 31-35 have been added. The subject matter of these claims is supported by the figures and text of the application as originally filed. (See, e.g., Figures 16-18, illustrating multiple business logic event handlers; see *also* original claims 10 and 14, describing business rules). Therefore, these claims do not add any new matter to the application and are fully supported under 35 U.S.C. § 112, first paragraph.

V. Conclusion

The claims each recite a novel combination of elements that is neither taught nor suggested by the applied references and so cannot be properly rejected under 35 U.S.C. §§ 102 or 103.

Based on these amendments and remarks, applicants respectfully request early allowance of this application. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-6065.

Please charge any deficiencies or credit any overpayments our Deposit Account No. 50-0665, under Order No. 612188007US from which the undersigned is authorized to draw.

Dated: 11/10/08

Respectfully submitted,

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